

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

UNITED STATES OF AMERICA

*

* **Criminal No. GLR 21-444**

v.

*

MICHAEL MCDONALD

*

MOTION TO SUPPRESS STATEMENTS

The Defendant, Michael McDonald, by and through counsel, Julie M. Reamy, respectfully moves for the order of this Honorable Court suppressing all statements, admissions, and confessions allegedly given by the defendant, whether oral, written or otherwise recorded, which the government proposes to use as evidence against him. In support of his motion, the defendant states the following:

1. The Defendant is charged by way of Indictment with one count of three counts of tax evasion in violation of 26 U.S.C. § 7201, and four counts of Failure to File a Tax Return in violation of 26 U.S.C. § 7203.

2. Discovery made available by the government indicates that the government intends to introduce at trial statements allegedly made by the defendant on October 7, 2021, while in the custody of law enforcement officers.

3. Any such statements, admissions or confessions were obtained in violation of the defendant's privilege against self-incrimination and his right to counsel, as guaranteed by the Fifth and Sixth Amendments to the United States Constitution.

4. Any statements, admissions or confessions were obtained in violation of the rights secured the defendant by the Supreme Court's holding in *Miranda v. Arizona*, 384 U.S. 436 (1965), and its progeny.

5. Any statements, admissions or confessions made by the defendant were involuntary.

6. The defendant is entitled to a hearing on the voluntariness of any statements, admissions or confessions attributed to him, in accordance with the provisions of Title 18 U.S.C. § 3501 and the principles set forth in *United States v. Inman*, 352 F.2d 954 (4th Cir. 1965).

WHEREFORE, for the above reasons and for any other reasons which may appear to the court, the defendant moves that all statements, admissions, or confessions, which the government proposes to use as evidence against him, whether oral, written or otherwise recorded, be suppressed.

Respectfully submitted,

_____/s/_____
Julie M. Reamy

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of March 2022, a copy of the foregoing *Motion to Suppress Statements* was filed electronically in the United States District Court for the District of Maryland, was served electronically through the Clerk of the United States District Court using CM/ECF, upon Assistant United States Attorney, Kathleen Gavin.

_____/s/_____
Julie M. Reamy